

Comerica Incorporated

Comerica Staff

- Annual completion of a training course designed to provide red flags of elder financial exploitation and who to call within the bank for assistance.

Fraud Services (FS) staff training

- FS Investigators - We have developed a presentation that was used to educate our Fraud Investigators on how to detect possible cases and steps to take if we suspect a problem.
- Within the FS department we have a team on the critical response staff that is specially trained to take calls from the branches and other sources and determine the appropriate action to take. We have established good working relationships with the local Adult Protective Services offices and work together to protect any elder that we may suspect is a victim.

Banking Center Staff Training:

- We have had a procedure in place since 2004 which outlines the red flags of financial exploitation and the action steps they should take if they suspect a customer may be a victim. They are trained to call the FS critical response line which is staffed by our trained investigators if they need assistance.
- In both our monthly Fraud Alert publications as well as our annual Fraud Awareness Month program, we have profiled the red flags of financial exploitation specific to the transactions that the BC may encounter.

Industry

- BITS published the "BITS Fraud Protection Guide: Protecting the Elderly and Vulnerable from Financial Fraud and Exploitation." This paper, available at: <http://www.bitsinfo.org/downloads/Publications%20Page/bitselderly.pdf>, was created to bring greater awareness to this type of fraud, which the financial services industry is often the first to detect. By recognizing changes in the patterns of customers with whom institutions have regular contact, this puts institutions in a unique position to assist in protecting customers and upholding the inherent trust relationship with clients. The "BITS Fraud Prevention Toolkit: Protecting the Elderly and Vulnerable from Financial Fraud and Exploitation." is designed to address a special need for which financial institutions are uniquely suited to assist. It provides information to support the implementation or improvement of a financial institution internal prevention program for education and awareness about abuse against the elderly and (vulnerable adults).

Community Training

- We have participated in several workshops sponsored by the United States Postal Inspection Service in conjunction with the National Consumer Protection Week. This workshop was targeted to senior citizens. Comerica bank attended the day long event making the attendees more aware of common fraud schemes such as inheritance schemes, identity theft and also those issues related to protecting themselves from financial abuse.
- Over the last few years, our department has also presented fraud workshops at several retirement, assisted living and senior centers in the Metro-Detroit area.
- Co-presented with the Oakland County Prosecutors office (Elder squad) on exploitation of the elderly at a workshop attended by 200 Adult Protective Services workers. The purpose was to raise their awareness when dealing suspected victims.
- Held training sessions for a local hospital's Geriatric program students to raise awareness on financial exploitation of the elderly.
- Conducted session for local trust administrators association.

Special Taskforces

- Oakland County, MI developed a task force in 2005 titled, S.A.V.E. (Servicing Adults that are Vulnerable and Elderly). This task force was created by a local Judge for the purpose of developing a coordinated community response in Oakland County to address suspected victims of this crime. Members include court staff, Oakland County Prosecutors, Adult Protective Services, victim advocate groups, hospitals, senior care facilities and Comerica Bank.
- A member of the Wayne County Elder Abuse, MI team to address and protect elders in the community from abuse. Members include the Special Prosecutor in charge of the Elder Abuse unit, local attorneys, Adult Protective Services, various community service providers and care facilities. Recently participated in planning and conducting day long event on financial exploitation to mark World Elder Abuse Day.